

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

IN RE: JOHNSON & JOHNSON TALCUM
POWER PRODUCTS MARKETING, SALES
PRACTICES, AND PRODUCTS LIABILITY
LITIGATION

No. 3:16-md-02738-MAS-
RLS

Bondurant v. Johnson & Johnson, No. 3:19-cv-14366
Converse v. Johnson & Johnson, No. 3:18-cv-17586
Gallardo v. Johnson & Johnson, No. 3:18-cv-10840
Judkins v. Johnson & Johnson, No. 3:19-cv-12430
Newsome v. Johnson & Johnson, No. 3:18-cv-17146
Rausa v. Johnson & Johnson, No. 3:20-cv-02947

**DECLARATION OF JESSICA DAVIDSON IN SUPPORT OF
DEFENDANTS JOHNSON & JOHNSON AND LLT MANAGEMENT,
LLC’S MEMORANDUM OF POINTS AND AUTHORITIES
IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT AND
STATEMENT OF UNCONTESTED MATERIAL FACTS**

I, Jessica Davidson, declare as follows:

I am an attorney and a partner with the law firm Skadden, Arps, Slate, Meagher & Flom LLP, counsel for Defendants Johnson & Johnson and LLT Management, LLC (hereafter, “Defendants”) in the above-captioned matter. The facts stated in this Declaration are true of my own personal knowledge. I submit this Declaration in Support of Defendants’ Memorandum of Points and Authorities in Support of Motion for Summary Judgment and Statement of Uncontested Material Facts.

1. Attached hereto as **Exhibit 1** is a true and correct copy of a Letter from Steven M. Musser, Ph.D., Deputy Director for Scientific Operations, Center for Food Safety & Applied Nutrition, to Samuel S. Epstein, M.D., Cancer Prevention Coalition, University of Illinois – Chicago School of Public Health (April 1, 2014).
2. Attached hereto as **Exhibit 2** is a true and correct copy of First Amended Complaint in *Bondurant v. Johnson & Johnson*, No. 3:19-cv-14366-MAS-RLS.
3. Attached hereto as **Exhibit 3** is a true and correct copy of the Amended Complaint in *Converse v. Johnson & Johnson*, No. 3:18-cv-17586-MAS-RLS.
4. Attached hereto as **Exhibit 4** is a true and correct copy of the Complaint in *Gallardo v. Johnson & Johnson*, No. 3:18-cv-10840-MAS-RLS.
5. Attached hereto as **Exhibit 5** is a true and correct copy of the Amended Complaint in *Judkins v. Johnson & Johnson*, No. 3:19-cv-12430-MAS-RLS.
6. Attached hereto as **Exhibit 6** is a true and correct copy of the Amended Complaint in *Newsome v. Johnson & Johnson*, No. 3:18-cv-17146-MAS-RLS.
7. Attached hereto as **Exhibit 7** is a true and correct copy of relevant excerpts of the transcript of the deposition of Pasqualina Rausa, January 27, 2021 (*Rausa*).
8. Attached hereto as **Exhibit 8** is a true and correct copy of Berge, *Genital Use of Talc and Risk of Ovarian Cancer: A Meta-analysis*, 27(3) Eur. J. Cancer Prev. 248 (2018).

9. Attached hereto as **Exhibit 9** is a true and correct copy of Taher, *Critical Review of the Association Between Perineal Use of Talc Powder and Risk of Ovarian Cancer*, 90 Reproductive Toxicol. 88 (2019).
10. Attached hereto as **Exhibit 10** is a true and correct copy of Penninkilampi & Eslick, *Perineal Talc Use and Ovarian Cancer: A Systematic Review and Meta-Analysis*, 29(1) Epidemiology 41 (2018).
11. Attached hereto as **Exhibit 11** is a true and correct copy of O'Brien, *Association of Powder Use in the Genital Area with Risk of Ovarian Cancer*, 323(1) JAMA 49 (2020).
12. Attached hereto as **Exhibit 12** is a true and correct copy of Gabriel, *Douching, Talc Use, and Risk for Ovarian Cancer and Conditions Related to Genital Tract Inflammation*, 28(11) Cancer Epidemiol. Biomarkers Prev. 1835 (2019).
13. Attached hereto as **Exhibit 13** is a true and correct copy of Gossett & del Carmen, *Use of Powder in the Genital Area and Ovarian Cancer Risk: Examining the Evidence*, 323(1) JAMA 29 (2020).
14. Attached hereto as **Exhibit 14** is a true and correct copy of Wentzensen & O'Brien, *Talc, Body Powder, and Ovarian Cancer: A Summary of the Epidemiologic Evidence* 163 Gynecol. Oncol. 199 (2021).
15. Attached hereto as **Exhibit 15** is a true and correct copy of relevant excerpts of the transcript of the deposition of Judith Wolf, September 14, 2021 (MDL).

16. Attached hereto as **Exhibit 16** is a true and correct copy of relevant excerpts of the transcript of the deposition of Daniel L. Clarke-Pearson, August 26, 2021 (MDL).

17. Attached hereto as **Exhibit 17** is a true and correct copy of relevant excerpts of the transcript of the deposition of Daniel L. Clarke-Pearson, March 8, 2024 (MDL).

18. Attached hereto as **Exhibit 18** is a true and correct copy of relevant excerpts of the transcript of the deposition of Daniel L. Clarke-Pearson, August 27, 2021 (MDL).

19. Attached hereto as **Exhibit 19** is a true and correct copy of the Second Amended Report of Judith Wolf Re: Linda Bondurant, May 28, 2024.

20. Attached hereto as **Exhibit 20** is a true and correct copy of Saavalainen, *Risk of Gynecologic Cancer According to the Type of Endometriosis*, 131(6) *Obstet. & Gynecol.* 1095 (2018).

21. Attached hereto as **Exhibit 21** is a true and correct copy of the Second Amended Report of Daniel L. Clarke-Pearson Re: Pasqualina Rausa, May 28, 2024.

22. Attached hereto as **Exhibit 22** is a true and correct copy of relevant excerpts of the transcript of the deposition of Anna Gallardo, January 12, 2021 (*Gallardo*).

23. Attached hereto as **Exhibit 23** is a true and correct copy of relevant excerpts of the transcript of the deposition of Hilary Converse, December 1, 2020 (*Converse*).

24. Attached hereto as **Exhibit 24** is a true and correct copy of relevant excerpts of the transcript of the deposition of Jamie Bianca Miller, March 18, 2021 (*Bondurant*).

25. Attached hereto as **Exhibit 25** is a true and correct copy of relevant excerpts of the transcript of the deposition of Carter Judkins, December 1, 2020 (*Judkins*).

26. Attached hereto as **Exhibit 26** is a true and correct copy of relevant excerpts of the transcript of the deposition of Tamara Newsome, December 9, 2020 (*Newsome*).

27. Attached hereto as **Exhibit 27** is a true and correct copy of CONVERSE_HILARY_YALENEWHAVENHOSPITAL_02086-02089.

28. Attached hereto as **Exhibit 28** is a true and correct copy of the Original Complaint in *Converse v. Johnson & Johnson*, No. 3:18-cv-17586-MAS-RLS.

29. Attached hereto as **Exhibit 29** is a true and correct copy of the Plaintiff Profile Form for Linda Bondurant.

30. Attached hereto as **Exhibit 30** is a true and correct copy of the Death Certificate of Linda Bondurant.

31. Attached hereto as **Exhibit 31** is a true and correct copy of the Plaintiff Profile Form for Hilary Converse.

32. Attached hereto as **Exhibit 32** is a true and correct copy of relevant excerpts of the transcript of the deposition of Peter Schwartz, January 28, 2021 (*Converse*).

33. Attached hereto as **Exhibit 33** is a true and correct copy of the Second Amended Report of Daniel L. Clarke-Pearson Re: Hilary Converse, May 28, 2024.

34. Attached hereto as **Exhibit 34** is a true and correct copy of GALLARDO_ANNA_BJH_00001-00006.

35. Attached hereto as **Exhibit 35** is a true and correct copy of the Plaintiff Profile Form for Anna Gallardo.

36. Attached hereto as **Exhibit 36** is a true and correct copy of the Second Amended Report of Judith Wolf Re: Anna Gallardo, May 28, 2024.

37. Attached hereto as **Exhibit 37** is a true and correct copy of the Plaintiff Profile Form for Carter Judkins.

38. Attached hereto as **Exhibit 38** is a true and correct copy of the Plaintiff Profile Form for Tamara Newsome.

39. Attached hereto as **Exhibit 39** is a true and correct copy of NewsomeT-WHSMCLMR-00075-00077.

40. Attached hereto as **Exhibit 40** is a true and correct copy of NEWSOMET_AAMC_C_MDR000295.

41. Attached hereto as **Exhibit 41** is a true and correct copy of the Second Amended Report of Daniel L. Clarke-Pearson Re: Tamara Newsome, May 28, 2024.

42. Attached hereto as **Exhibit 42** is a true and correct copy of NewsomeT-WHSMR-00017.

43. Attached hereto as **Exhibit 43** is a true and correct copy of the Plaintiff Profile Form for Pasqualina Rausa.

44. Attached hereto as **Exhibit 44** is a true and correct copy of RausaP-DUHSMR-00003.

45. Attached hereto as **Exhibit 45** is a true and correct copy of Gonzalez, *Douching, Talc Use, and Risk of Ovarian Cancer*, 27(6) Epidemiology 797 (2016).

46. Attached hereto as **Exhibit 46** is a true and correct copy of Chang, *Use of Personal Care Product Mixtures and Incident Hormone-Sensitive Cancers in the Sister Study: A U.S.-Wide Prospective Cohort*, 183 Environ. Int'l 1 (2024).

47. Attached hereto as **Exhibit 47** is a true and correct copy of Burke, *Executive Summary of the Ovarian Cancer Evidence Review Conference*, 142(1) Obstet. Gynecol. 179 (2023).

I certify under penalty of perjury that the foregoing is true and correct.

Dated: August 23, 2024



Jessica Davidson